

# **EXHIBIT G**

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Altria Enterprises LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: JUUL LABS, INC., MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

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This Document Relates to:

*Robin Bain, individually, and as the legal  
Guardian of her minor child, B.B. v. Juul  
Labs, Inc., et al.*

Case No. 3:20-cv-07174

Case No. 19-md-02913-WHO

**ALTRIA DEFENDANTS' MODIFIED  
WITNESS LIST**

Hon. William H. Orrick

Pursuant to the parties' agreement regarding the exchange of pretrial materials and the Order Regarding Pretrial Schedule (ECF No. 2943), as well as the Court's standing Civil Pretrial Order, Defendants Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC, Altria Group Distribution Company, and Altria Enterprises LLC (the "Altria Defendants") provide below a witness list identifying the witnesses whom the Altria Defendants expect they may call either live or by deposition designation, along with a brief summary of anticipated testimony, based on the information available to the Altria Defendants at this time. Witnesses identified with an asterisk (\*) are those the Altria Defendants currently anticipate they are more likely to call.

| Ref. No. | Witness & Category              | Brief Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | <b>Live</b>                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1        | Jupe, Richard                   | We anticipate that Mr. Jupe would testify to product innovation efforts at Altria, including in the e-vapor category; Altria's research into and findings with respect to e-vaping and nicotine satisfaction; Altria products' performance and prospects for obtaining a PMTA; Altria's commitment to reduced harm products and youth prevention; Altria's understanding of FDA oversight and of the PMTA process; and Altria's research into and findings with respect to JUUL. |
| 2        | Murphy, Dr. Kevin <sup>*1</sup> | Dr. Murphy's opinions and the basis thereof are set forth in his expert report. Among other related topics, based on his experience as an economist and his analysis of relevant evidence, we anticipate Dr. Murphy would testify concerning the limited impact of Altria's services on JUUL sales and the flaws in the methodology and analysis of Plaintiff's expert witness, Dr. David Cutler.                                                                                |
|          | <b>Live/Deposition</b>          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3        | Flora, Jason*                   | We anticipate that Dr. Flora would testify to product innovation efforts at Altria, including in the e-vapor category; Altria's research into and findings with respect to e-vaping and nicotine satisfaction; Altria products' performance and prospects for obtaining a PMTA; Altria's understanding of FDA oversight and of the PMTA process; Altria's commitment to reduced harm products and youth prevention; Altria's research into and                                   |

<sup>1</sup> The Altria Defendants have provided Dr. Murphy's expert report to opposing counsel. Dr. Murphy's report includes his CV, theories, conclusions, and the bases thereof.

| Ref. No. | Witness & Category | Brief Summary                                                                                                                                                                                                                                                                                            |
|----------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                    | findings with respect to JUUL; and Altria's due diligence of JLI prior to its investment.                                                                                                                                                                                                                |
| 4        | Hunter, Jennifer*  | We anticipate that Ms. Hunter would testify to the JLI-Altria transaction rationale; Altria's understanding of FDA oversight and of the PMTA process; and Altria's commitment and efforts to combat youth use of e-vapor products and the history of Altria's interactions with the FDA on that subject. |
|          | <b>Deposition</b>  |                                                                                                                                                                                                                                                                                                          |
| 5        | Blaylock, Brian*   | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 6        | Burns, Kevin       | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 7        | Fernandez, Pascal* | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 8        | Gardner, William*  | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 9        | Garnick, Murray*   | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 10       | Gifford, William*  | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 11       | Gould, Ashley*     | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 12       | Longest, Kaitlin   | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 13       | Pritzker, Nicholas | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 14       | Schroder, Steven*  | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 15       | Willard, Howard*   | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |
| 16       | Xu, James          | Testimony as separately designated following the parties' agreed upon procedure for deposition designations.                                                                                                                                                                                             |

The witnesses above are listed in alphabetical order, and the Altria Defendants make no representation that such witnesses, if called to testify, will be called in the order set forth herein. The Altria Defendants reserve all rights to supplement or amend this list, including but not limited to, the right to:

- A. Call witnesses at trial, in their case-in-chief or otherwise, not included on this list, or to include additional or different witnesses on any list submitted to the Court.
- B. Adjust the list of witnesses currently identified as individuals the Altria Defendants are likely to call in their case-in-chief.
- C. Supplement and/or amend this list in light of any discovery, including depositions, that has not yet been completed.
- D. Supplement and/or amend this list in light of the evidence Plaintiff elicits at trial.
- E. Supplement and/or amend this list in light of Plaintiff's future exhibit list disclosures.
- F. Supplement and/or amend this list to be consistent with the Court's ruling on any motions *in limine* filed in this action.
- G. Not call any of the persons listed below.
- H. Rely on the testimony of any witness identified or called by another party.
- I. Question the persons listed above about any topics that are the subjects of testimony by witnesses called by Plaintiff.
- J. Call any witness listed below or any other persons for impeachment or rebuttal purposes.
- K. Submit as evidence deposition testimony taken in this matter, regardless of whether the deponent is listed below, in accordance with the parties' agreed upon designation process.
- L. Call any witnesses to the extent necessary to support the admission of documents into evidence in the event a stipulation cannot be reached concerning the admissibility or authenticity of such documents.

/s/ Beth A. Wilkinson

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